

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

2015 AUG 19 PM 2:07

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAWRENCE MADRID (1),
[REDACTED]

Defendants.

§ SEALED

§ CRIMINAL NO. EP-15-CR-

§ INDICTMENT

§ CT 1: 8:1324(a)(1)(A)(v)(I), (a)(1)(A)(iv) and
§ (a)(1)(B)(i)- Conspiracy to Encourage and
§ Induce the Illegal Entry of Aliens for Financial
§ Gain;

§ CT 2-4: 8:1324(a)(2)(B)(ii) and 18:2 - Bringing
§ of Aliens without Authorization for Financial
§ Gain; Aiding and Abetting

§ CT5-6: 18:201(b)(2) - Bribery of a Public
§ Official

§ CT 7: 18:201(b)(1) and 18:2- Bribery of a
§ Public Official; Aiding and Abetting

THE GRAND JURY CHARGES:

EP15CR1380

COUNT ONE

(8 U.S.C. §§ 1324(a)(1)(A)(v)(I), (a)(1)(A)(iv) and (a)(1)(B)(i))

On or about August 10, 2010, and continuing to and including on or about September 23, 2011, in the Western District of Texas, the District of New Mexico, and elsewhere the Defendant (s),

LAWRENCE MADRID (1),
[REDACTED]

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with others to the Grand Jury unknown, to commit offenses against the United States, namely: to encourage and induce aliens to come to, enter, and reside in the United States,

knowing and in reckless disregard of the fact that such coming to, entry, and residence in the United States was in violation of law, all done for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), (a)(1)(A)(iv) and (a)(1)(B)(i).

COUNT TWO

(8 U.S.C. §§ 1324(a)(2)(B)(ii) and 18 U.S.C. § 2)

On or about October 20, 2010, in the Western District of Texas, the District of New Mexico, and elsewhere the Defendant,

LAWRENCE MADRID (1),

knowing and in reckless disregard of the fact that a certain alien had not received prior official authorization to come to, enter, and reside in the United States, did bring to and attempt to bring to, and did aid and abet the bringing to and attempt to bring to the United States such alien, for the purpose of commercial advantage and private financial gain, in violation of Title 18, United States Code, Section 2 and Title 8, United States Code, Sections 1324(a)(2)(B)(ii).

COUNT THREE

(8 U.S.C. §§ 1324(a)(2)(B)(ii) and 18 U.S.C. § 2)

On or about October 20, 2010, in the Western District of Texas, the District of New Mexico, and elsewhere the Defendant,

[REDACTED]

knowing and in reckless disregard of the fact that a certain alien had not received prior official authorization to come to, enter, and reside in the United States, did bring to and attempt to bring to, and did aid and abet the bringing to and attempt to bring to the United States such alien, for the purpose of commercial advantage and private financial gain, in violation of Title 18, United States Code, Section 2 and Title 8, United States Code, Sections 1324(a)(2)(B)(ii).

COUNT FOUR

(8 U.S.C. §§ 1324(a)(2)(B)(ii) and 18 U.S.C. § 2)

On or about September 23, 2011, in the Western District of Texas, the District of New Mexico, and elsewhere the Defendant,

[REDACTED]

knowing and in reckless disregard of the fact that a certain alien had not received prior official authorization to come to, enter, and reside in the United States, did bring to and attempt to bring to, and did aid and abet the bringing to and attempt to bring to the United States such alien, for the purpose of commercial advantage and private financial gain, in violation of Title 18, United States Code, Section 2 and Title 8, United States Code, Sections 1324(a)(2)(B)(ii).

COUNT FIVE

(18 U.S.C. § 201(b)(2))

On or about October 20, 2010, in the Western District of Texas, the District of New Mexico, and elsewhere the Defendant,

LAWRENCE MADRID (1),

a public official, directly and indirectly did corruptly demand, seek, receive, accept and agree to receive something of value personally, being induced to do an act and omit to do an act in violation of his official duty; that is the Defendant permitted an alien of the United States to enter into the United States without proper authorization in exchange for a sum of United States currency, in violation of Title 18, United States Code, Section 201(b)(2).

COUNT SIX

(18 U.S.C. § 201(b)(2))

On or about September 23, 2011, in the Western District of Texas, the District of New Mexico, and elsewhere the Defendant,

LAWRENCE MADRID (1),

a public official, directly and indirectly did corruptly demand, seek, receive, accept and agree to receive something of value personally, being induced to do an act and omit to do an act in violation of his official duty; that is the Defendant permitted an alien of the United States to enter into the United States without proper authorization in exchange for a sum of United States currency, in violation of Title 18, United States Code, Section 201(b)(2).

COUNT SEVEN

(18 U.S.C. § 201(b)(1) and 18 U.S.C. § 2)

On or about September 23, 2011, in the Western District of Texas, the District of New Mexico, and elsewhere the Defendants,

[REDACTED]

directly and indirectly gave, offered, and promised a thing of value to a public official, with intent to induce said public official to do an act and omit to do an act in violation of his official duty; that is the public official, a United States Customs and Border Protection Officer to permit an alien of the United States to enter into the United States without proper authorization in exchange for a sum of United States currency, in violation of Title 18, United States Code, Sections 2 and 201(b)(1).

A TRUE BILL
ORIGINAL SIGNATURE
REDACTED PURSUANT TO
E-GOVERNMENT ACT OF 2002

FOREPERSON OF THE GRAND JURY

RICHARD L. DURBIN, JR.
UNITED STATES ATTORNEY

BY:


Assistant U.S. Attorney